

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

Sherell Hodge,
Plaintiff,

V.
BK

Civil Action No. 3:23-cv-02048-N-

Ashley Grayson, The Credit Pie, LLC,
Defendant.

AMENDED COMPLAINT

INTRODUCTION

Plaintiff Sherell Hodge, files this Amended Complaint against Defendant Ashley Grayson and The Credit Pie, LLC, and in support thereof, respectfully states the following:

JURISDICTION AND VENUE

1. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1332(a) as the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different states.
2. Venue is proper in this Court under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this judicial district.

PARTIES

3. Plaintiff Sherell Hodge is a resident of Dallas, Texas.
4. Defendant Ashley Grayson is believed to be a resident of North Carolina and can be served at 7292 Three Sisters Lane, Concord, NC 28081.
5. Defendant The Credit Pie, LLC is a business entity with its principal place of business located at 227 W. 4th St. Suite 100 Charlotte, NC 28202 and can be served through its registered agent Ashley Grayson, 7292 Three Sisters Lane. Concord, NC 28081.

STATEMENT OF FACTS

6. Defendant Ashley Grayson, motivated by retaliation for Plaintiff's public criticism of Grayson's services, engaged in a scheme that endangered Plaintiff's life by hiring an individual to commit murder.

7. On or about September 9, 2022, Plaintiff discovered the threat to her life through an ongoing FBI investigation.

8. Subsequently, unidentified individuals approached Plaintiff's residence, instilling fear and forcing Plaintiff to relocate for her safety.

9. The conduct of Defendant Grayson has caused Plaintiff severe emotional distress, significantly diminished her quality of life, and resulted in an invasion of her privacy.

CAUSES OF ACTION

Count I: Intentional Infliction of Emotional Distress

10. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

11. Defendant Grayson's conduct was extreme and outrageous and was intended to cause, and did cause, severe emotional distress to Plaintiff.

Count II: Negligent Infliction of Emotional Distress

12. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

13. Defendant Grayson engaged in negligent conduct that foreseeably resulted in severe emotional distress to Plaintiff.

Count III: Invasion of Privacy

14. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

15. Defendant Grayson's actions involved the unauthorized dissemination of Plaintiff's private information, which was used in furtherance of the criminal scheme.

Count IV: Loss of Enjoyment of Life

16. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

17. As a direct and proximate result of Defendant Grayson's conduct, Plaintiff has suffered a loss of enjoyment of life.

Count V: Conspiracy

18. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

19. Defendant Grayson conspired with unknown individuals to commit the tortious acts that are the subject of this complaint.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Sherell Hodge prays for judgment against Defendant Ashley Grayson and The Credit Pie, LLC, and requests the following relief:

- a. Actual damages and punitive sufficient to punish the Defendants for their conduct and to deter similar conduct in the future; in an amount to be determined at trial, but no less than \$5,000,000;
- c. Attorney's fees and costs of this action; and
- d. Such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

Sherell Hodge
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Date: November 5, 2023